Remarks

In response to the Office Action dated January 25, 2006, the Applicant respectfully requests reconsideration in view of the following remarks. In the present application, independent claims 1, 15, and 17 have been amended. Claim 1 has been amended to clarify that the server is in communication with a secure data network and the database external to the server is in communication with a non-secure data network. Claims 15 and 17 have been amended to remove the term "first" from the phrase "a first server of a secure data network." Support for these amendments may be found in Figure 2 and in paragraph 27 of the Specification. No new matter has been added.

Claims 1-20 are pending in the application. In the Office Action, claims 7-19 are rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Claims 1-6 are rejected under 35 U.S.C. § 102(e) as being anticipated by Lamb et al. (U.S. Patent No. 6,747,970, hereinafter "Lamb").

Applicant's Statement of the Substance of the Interview

A telephonic interview between Applicant's representative Alton Hornsby, III (Registration No. 47,299) and the Examiner was held on April 4, 2006 to discuss the rejection of independent claims 7, 15, and 18 under 35 U.S.C. § 112, first paragraph (for allegedly failing to provide support for the limitations "a first server of a secure data network" and "a server of a secure data network") and the rejection of independent claim 1 in view of the cited reference Lamb. In the interview, the Applicant's representative provided support for a server of a secure data network in the Specification (Figure 2 and paragraph 27). The Examiner agreed with the supporting reference and agreed to remove the Section 112 rejection if the term "first" was removed from the limitation "a first server of a secure data network." With respect to the rejection of claim 1, a proposed amendment was discussed (the amendment reciting a server in

communication with a secure data network and a database external to the server in communication with a non-secure data network) to overcome the rejection of claim 1. The Examiner agreed to consider the proposed amendment if submitted with a Request for Continued Examination (RCE).

Claim Rejections - 35 U.S.C. §112, First Paragraph

Claims 7-19 are rejected for failing to comply with the written description requirement because the claims contain subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor, at the time the application was filed, had possession of the claimed invention. In particular, the claims are rejected for allegedly lacking support in the figures and the specification for the terms "a first server of a secure data network" (in independent claims 7 and 15) and "a server of a secure data network" (in independent claim 18). The rejection of these claims is respectfully traversed.

As discussed above (for example, in the Applicant's Statement of the Substance of the Interview), support for a server of a secure data network may be found in Figure 2 and in paragraph 27 of the Specification. Also as discussed above in the Applicant's Statement of the Substance of the Interview, independent claims 7 and 15 have been amended to remove the term "first" from the feature "a first server of a secure data network" appearing in these claims. Since the feature of a "server of a secure data network" appearing in claims 7, 15, and 18 is supported by both the figures and the specification in the application, it is respectfully submitted that the rejection of these claims should be withdrawn. Furthermore, as claims 8-14, 15-17, and 19 depend from independent claims 7, 15, and 18, respectively, it is respectfully submitted that the rejection of these claims should also be withdrawn.

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Claim Rejections - 35 U.S.C. §102

Claims 1-6 are rejected as being anticipated by Lamb. The rejection of these claims is respectfully traversed.

Amended independent claim 1 specifies an apparatus for allowing a calling party to initiate a telephone call from an Internet-enabled device. The apparatus includes a server for receiving an originating telephone number and a destination telephone number in response to a command from the Internet-enabled device wherein at least the destination telephone number is imported from a database external to the server, for generating a call request, and for transmitting the request to a telecommunications network to request the network to establish a connection between the originating telephone number and the destination telephone number, wherein the server is in communication with a secure data network and the database external to the server is in communication with a non-secure data network.

It is respectfully submitted that Lamb fails to teach each and every feature specified in amended independent claim 1. For example, Lamb fails to teach a server in communication with a secure data network and a database external to the server in communication with a non-secure data network. As discussed in the Applicant's previous response, Lamb provides a user agent that a user may access via a user agent interface to request that a call may be established. The user agent is provided with the origination and destination numbers. Lamb fails to disclose that these numbers are imported from a database external to the server which is in communication with a non-secure data network. Lamb further fails to disclose that while the database is in communication with a non-secure data network, a server for receiving an originating telephone number and a destination telephone number in response to a command an Internet-enabled device, is in communication with a different secure network.

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Based on the foregoing, amended independent claim 1 is allowable over Lamb and the rejection of this claim should be withdrawn. Claims 2-5 depend from amended independent claim 1, and are thus allowable for at least the same reasons. Therefore, the rejection of claims 2-5 should also be withdrawn.

Although not specifically rejected in the Office Action in view of Lamb, it is respectfully submitted that pending claims 7-20 are also allowable over Lamb. Independent claims 7 and 15 recite similar features as amended independent claim 1, discussed above. In particular, claims 7 and 15 each recite a database maintained on a non-secure network while a server resides on a different secure network, and a destination number which comes from the database maintained on the non-secure network. As discussed above with respect to amended independent claim 1, Lamb fails to teach these features. Thus, claims 7 and 15 are allowable. Claims 8-14 and 16-18 depend from claims 7 and 15 respectively and thus are also allowable for at least the same reasons. Independent claim 18 recites a system for allowing a calling party to initiate a telephone call from an Internet-enabled device, the system comprising a server of a secure network separate from the IP network for receiving an originating telephone number and a destination telephone number in response to a command from the Internet-enabled device wherein the destination telephone number comes from a selection made by the Internet-enabled device from a telephone directory of the IP network. Lamb fails to disclose that the destination telephone number comes from a selection made by the device from a telephone directory of the IP network, where the IP network is different than the secure network upon which the server resides. In Lamb, there is no discussion of a separate network from the network where the user agent server is located, where the separate network is an IP network having a telephone directory and where the destination number comes from a selection made within the telephone directory.

Accordingly, Lamb fails to disclose all of the elements of claim 18, and claim 18 is allowable over Lamb for at least these reasons. Claims 19 and 20 depend from claim 18 and thus are also allowable for at least the same reasons.

Conclusion

In view of the foregoing amendments and remarks, this application is now in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is invited to call the Applicant's attorney at the number listed below.

No fees are believed due. However, please charge any additional fees or credit any overpayment to Deposit Account No. 50-3025.

Respectfully submitted,

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